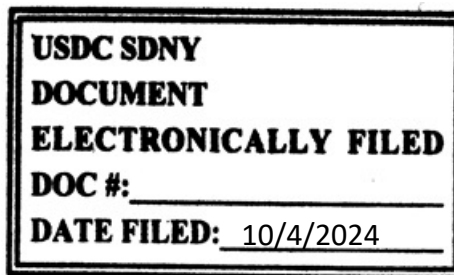




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October 1, 2024

VIA ECF

The Honorable Katharine H. Parker, U.S.M.J.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 17D
New York, NY 10007

The Court adopts the parties' proposed schedule for damages discovery. The parties shall file a joint status letter by **November 4, 2024**, updating the Court on the status of damages discovery.

Re: Gabriella Blasetti v. Schindler Elevator Corporation
Civil Action No. 1:21-cv-07540-JPC-KHP

SO ORDERED:

HON. KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE

10/4/2024

Dear Judge Parker:

We represent defendant, Schindler Elevator Corporation ("SEC"), in the above-referenced matter. We write, jointly with plaintiff, in response to Your Honor's July 31, 2024 Order requiring the parties to provide a joint status letter with a proposed schedule for damages discovery (Document No. 70).

As Your Honor is aware from prior correspondence, the Workers' Compensation Board Panel upheld the Workers' Compensation Law Judge decision allowing plaintiff's treatment to proceed, which included an approval for both ankle and knee surgery. Plaintiff's ankle surgery was completed on March 8, 2024, and she was undergoing post-surgery physical therapy on the ankle. After following up with her doctor, plaintiff has now advised she will not be moving forward with her knee surgery.

Accordingly, the parties are ready to proceed with damages discovery. The parties propose the following damages discovery schedule:

- Plaintiff to provide any updated HIPAA authorizations by October 15, 2024.
- Plaintiff's damages deposition to take place on or before December 1, 2024.
- Plaintiff to serve damages expert reports by January 15, 2025.
- Defendant to serve damages expert reports by March 3, 2025.
- Expert depositions to take place on or before April 15, 2025.

The parties have worked cooperatively together on this matter and are continuing to do so.

We thank Your Honor for considering this request.

Respectfully submitted,

Catherine G. Bryan

CGB/PJK

cc: Thomas Pardo, Esq. (via ECF)